

# Exhibit L

Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

NL = Not Legal / No Lawyer

F = Fiduciary Exception

W = Waiver

C = Crime-Fraud

4/25

## Eber Defendants' Amended Privilege Log 9/29/2017 Production

<u>Bates Number</u>	<u>Date of Document</u>	<u>Type of Document</u>	<u>General Subject Matter</u>	<u>Author(s)</u>	<u>Addressee(s)</u>	<u>Reason Document Withheld From Disclosure</u>
00000713 00000713a-t	11/27/2009	Electronic mail and bank document drafts	Follow up to conversation regarding EBWLC debt	Wendy Eber	Elliot Gumaer, Esq. cc: Lester Eber	Attorney Client Privilege
00000714-00000728	3/22/2010	Electronic mail and Security Agreement draft	Request to review and comment on bank documents and correspondence	Janet Lissow on behalf of Lester Eber	Elliot Gumaer, Esq. cc: Lester Eber	Attorney Client Privilege
00000729	10/5/2011	Electronic mail	Money Lester Eber loaned to EBWLC	Wendy Eber	Janet Lissow	Attorney Client Privilege
00000729	10/5/2011	Electronic mail	Money Lester Eber loaned to EBWLC	Lester Eber	Wendy Eber cc: Janet Lissow	Attorney Client Privilege
00000729	10/1/2011	Electronic mail	Money Lester Eber loaned to EBWLC	Lester Eber	Wendy Eber	Attorney Client Privilege
00000729	9/30/2011	Electronic mail	Money Lester Eber loaned to EBWLC	Lester Eber	Wendy Eber	Attorney Client Privilege
00000729-00000731	9/29/2011	Electronic mail	Money Lester Eber loaned to EBWLC	David Belt, Esq.	Lester Eber cc: Russell Green, Esq.	Attorney Client Privilege
00000732-00000733	9/29/2011-10/5/2011	Electronic mail	*duplicate of Bates 00000729-00000731	*duplicate of Bates 00000729-00000731	*duplicate of Bates 00000729-00000731	Attorney Client Privilege

NL  
F  
WNL  
F  
WNL  
FNL  
FNL  
FNL  
FNL  
F

Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Amended Privilege Log 9/29/2017 Production

NL F	00000734	3/22/2010	Electronic mail	Questions regarding bank loan documents	Wendy Eber	Glenn Sturm, Esq. cc: Lester Eber	Attorney Client Privilege
NL F	00000734	2/26/2010	Electronic mail	Forwarding 2/23/2010 electronic mail, below	Wendy Eber	Wendy Eber	Attorney Client Privilege
F	00000734-00000735	2/23/2010	Electronic mail	Questions regarding loan documents	Steve Park, Esq.	Wendy Eber cc: Will Gaines, Esq. cc: Patty Byrd, Esq. cc: Glenn Sturm, Esq.	Attorney Client Privilege
F	00000735	2/23/2010	Electronic mail	Questions regarding bank loan documents	Glenn Sturm, Esq.	Steve Park, Esq. cc: Will Gaines, Esq. cc: Patty Byrd, Esq. cc: Wendy Eber	Attorney Client Privilege
F	00000735	2/23/2010	Electronic mail	Questions regarding bank loan documents	Will Gaines, Esq.	Glenn Sturm, Esq.	Attorney Client Privilege
F	00000735-00000736	2/22/2010	Electronic mail	Questions regarding bank loan documents	Glenn Sturm, Esq.	Will Gaines, Esq.	Attorney Client Privilege
F	00000736	2/22/2010	Electronic mail	Questions regarding bank loan documents	Will Gaines, Esq.	Glenn Sturm, Esq.	Attorney Client Privilege

Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Amended Privilege Log 9/29/2017 Production

F	00000736	2/22/2010	Electronic mail	Questions regarding bank loan documents	Glenn Sturm, Esq.	Will Gaines, Esq. cc: Patty Byrd, Esq. cc: Wendy Eber	Attorney Client Privilege
F	00000736	2/22/2010	Electronic mail	Questions regarding bank loan documents	Wendy Eber	Patty Byrd, Esq.	Attorney Client Privilege
F	00000736-00000737	2/22/2010	Electronic mail	Questions regarding bank loan documents	Patty Byrd, Esq.	Wendy Eber	Attorney Client Privilege
NL F	00000738	1/19/2012	Electronic mail	Forwarding 1/18/2012 electronic mail, below	Lester Eber	Janet Lissow	Attorney Client Privilege
NL F	00000738-00000739	1/18/2012	Electronic mail	Questions regarding bank loan documents	David Belt, Esq.	Lester Eber	Attorney Client Privilege
NL F W	00000741	3/9/2012	Electronic mail	Confirming telephone conference with Glenn Sturm, Esq. regarding bank relationship issues	Wendy Eber	Elliot Gumaer, Esq. cc: Lester Eber	Attorney Client Privilege
NL W F	00000741	3/9/2012	Electronic mail	Bank relationship issues	Elliot Gumaer, Esq.	Wendy Eber cc: Lester Eber	Attorney Client Privilege
	00017223	8/4/2017	Electronic mail	Client forwarding documents to Underberg & Kessler LLP	Wendy Eber	Underberg & Kessler LLP	Attorney Client Privilege

Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

**Eber Defendants' Amended Privilege Log 9/29/2017 Production**

00017372	8/4/2017	Electronic mail	Client forwarding documents to Underberg & Kessler LLP	Wendy Eber	Underberg & Kessler LLP	Attorney Client Privilege
00017391	8/4/2017	Electronic mail	Client forwarding documents to Underberg & Kessler LLP	Wendy Eber	Underberg & Kessler LLP	Attorney Client Privilege
00017665	8/4/2017	Electronic mail	Client forwarding documents to Underberg & Kessler LLP	Wendy Eber	Underberg & Kessler LLP	Attorney Client Privilege
00017666-00017670	6/7/2016	Settlement Agreement drafts EBWLC / PBGC	Confidential Summary of Key Terms	Bond Schoeneck & King PLLC	Wendy Eber	Attorney Client Privilege
00017687	8/4/2017	Electronic mail	Client forwarding documents to Underberg & Kessler LLP	Wendy Eber	Underberg & Kessler LLP	Attorney Client Privilege
00017769	8/4/2017	Electronic mail	Client forwarding documents to Underberg & Kessler LLP	Wendy Eber	Underberg & Kessler LLP	Attorney Client Privilege
00017776	8/4/2017	Electronic mail	Client forwarding documents to Underberg & Kessler LLP	Wendy Eber	Underberg & Kessler LLP	Attorney Client Privilege
00017818	8/4/2017	Electronic mail	Client forwarding documents to Underberg & Kessler LLP	Wendy Eber	Underberg & Kessler LLP	Attorney Client Privilege



Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Privilege Log May 8, 2018 Production

<u>Bates Number</u>	<u>Date of Document</u>	<u>Type of Document</u>	<u>General Subject Matter</u>	<u>Author(s)</u>	<u>Addressee(s)</u>	<u>Reason Document Withheld From Disclosure</u>
EB-00026240	April 10, 2014	Electronic mail	Subpoenas Harris Beach v. Eber	Joseph Nacca, Esq.	Ingrid Palermo, Esq.	Attorney Work Product
EB-00026240 – EB-00026241	April 7, 2014	Electronic mail	Harris Beach v. Eber	Edward Hourihan, Esq.	Cindy Raskopf cc to Josesph Nacca, Esq.	Attorney Work Product
EB-00026241	April 7, 2014	Electronic mail	Harris Beach v. Eber	David Hardy, Esq.	Edward Hourihan, Esq.	Attorney Work Product
EB-00026241 – EB-00026242	March 28, 2014	Electronic mail	Harris Beach v. Eber	Kevin Tompsett, Esq.	David Hardy, Esq. cc to Sherwin Yoder, Esq.	Attorney Work Product
EB-00026242 – EB-00026243	March 28, 2014	Electronic mail	Appellate Division Decision	Kevin Tompsett, Esq.	Sherwin Yoder, Esq. cc to Joseph Picciotti	Attorney Work Product
EB-00026244	Undated	Notes/Questions	Harris Beach v. Eber	W. Eber	Bond, Schoenick & King	Attorney Client Privilege
EB-00026245	February 13, 2015	Electronic mail	Harris Beach v. Eber	Ingrid Palermo, Esq.	Susan Heffner	Attorney Client Privilege
EB-00026245	February 13, 2015	Electronic mail	Lester Eber's Affidavit in Harris Beach v. Eber	Wendy Eber	Ingrid Palermo, Esq.	Attorney Client Privilege
EB-00026246 – EB-00026247	February 13, 2015	Chart	Harris Beach v. Eber	Wendy Eber	Ingrid Palermo, Esq.	Attorney Client Privilege
EB-00026248 – EB-00026250	October 27, 2015	Letter	Settlement of Harris Beach v. Eber	Ingrid Palermo, Esq.	Wendy Eber Lester Eber	Attorney Client Privilege
EB-00026251 – EB-00026253	Undated	Notes/Questions	Settlement of Harris Beach v. Eber	John Herbert, Esq.	Bond, Schoeneck & King PLLC	Attorney Client Privilege/Attorney Work Product

Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

**Eber Defendants' Privilege Log May 8, 2018 Production**

EB-00026254	October 7, 2015	Electronic mail	Settlement of Harris Beach v. Eber	John Herbert, Esq.	Edward Hourihan, Esq. Cc to Wendy Eber, Lester Eber	Attorney Client Privilege
EB-00026255	May 29, 2015	Electronic mail	Harris Beach v. Eber	Edward Hourihan, Esq.	Cindy Raskopf	Attorney Work Product
EB-00026255 – EB-00026256	May 27, 2015	Electronic mail	Lester Eber's Affidavit in Harris Beach v. Eber	Lonie Hassel, Esq.	Ingrid Palermo, Esq., Wendy Eber, Lester Eber, John Herbert, Esq., Edward Hourihan, Esq.	Attorney Client Privilege/Attorney Work Product
EB-00026256 – EB-00026257	May 20, 2015	Electronic Mail	Lester Eber's Affidavit in Harris Beach v. Eber	Ingrid Palermo, Esq.	Gary Ford, Esq., Lonie Hassel, Esq., Wendy Eber, Lester Eber, John Herbert, Esq. cc to Edward Hourihan, Esq.	Attorney Client Privilege/Attorney Work Product
EB-00026258	December 15, 2014	Electronic Mail	Harris Beach v. Eber	Edward Hourihan, Esq.	Ingrid Palermo, Esq., Joseph Nacca, Esq.	Attorney Client Privilege/Attorney Work Product
EB-00026258 – EB-00026259	December 15, 2014	Electronic mail	Harris Beach v. Eber	Wendy Eber	Edward Hourihan, Esq., John Herbert, Esq. cc to Lester Eber	Attorney Client Privilege
EB-00026260	December 15, 2014	Electronic mail	Harris Beach v. Eber	Wendy Eber	David Belt, Esq.	Attorney Client Privilege

*Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.*

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

**Eber Defendants' Privilege Log May 8, 2018 Production**

EB-00026260	December 14, 2014	Electronic mail	Harris Beach v. Eber	Edward Hourihan, Esq.	Lester Eber, Wendy Eber, John Herbert, Esq.	Attorney Client Privilege
EB-00026261 – EB-00026262	December 15, 2014	Electronic mail	Harris Beach v. Eber	W. Eber	Edward Hourihan, Esq., John Herbert, Esq.	Attorney Client Privilege
EB-00026263	December 15, 2014	Electronic mail	Harris Beach v. Eber	Wendy Eber	Edward Hourihan, Esq., John Herbert, Esq. cc to Lester Eber	Attorney Client Privilege
EB-00026263 – EB-00026264	December 15, 2014	Electronic mail	Harris Beach v. Eber	David Belt, Esq.	Wendy Eber	Attorney Client Privilege/Attorney Work Product
EB-00026264 – EB-00026265	December 14-15, 2014	Electronic mail	*duplicate of Bates EB-00026260	*duplicate of Bates EB-00026260	*duplicate of Bates EB-00026260	Attorney Client Privilege
EB-00026266	December 7, 2014	Electronic mail	Harris Beach v. Eber motions	Edward Hourihan, Esq.	Joseph Nacca, Esq., Ingrid Palermo, Esq., Julie Roth, Esq., Brian Laudadio, Esq.	Attorney Work Product
EB-00026266	December 7, 2014	Electronic mail	Harris Beach v. Eber motions	Edward Hourihan, Esq.	Joseph Nacca, Esq.	Attorney Work Product
EB-00026266	December 7, 2014	Electronic mail	Harris Beach v. Eber motions	Joseph Nacca, Esq.	Edward Hourihan, Esq.	Attorney Work Product
EB-00026267	August 11, 2014	Electronic mail	Fourth Department appeal Harris Beach v. Eber	Ingrid Palermo, Esq.	Edward Hourihan, Esq. cc to Cindy Raskopf	Attorney Work Product



*Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.*

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

**Eber Defendants' Privilege Log May 8, 2018 Production**

EB-00026267	August 11, 2014	Electronic mail	Fourth Department appeal Harris Beach v. Eber	David Hardy, Esq.	Ingrid Palermo, Esq. cc to Wendy Eber	Attorney Work Product
EB-00026268	April 25, 2014	Electronic mail	Harris Beach v. Eber	David Hardy, Esq.	Ingrid Palermo, Esq. cc to Wendy Eber	Attorney Client Privilege
EB-00026269 – EB-00026270	April 25, 2014	Electronic mail	Harris Beach v. Eber	Ingrid Palermo, Esq.	Edward Hourihan, Esq. cc to Cindy Raskopf	Attorney Client Privilege, Attorney Work Product
EB-00026271	April 25, 2014	Memorandum	Harris Beach v. Eber	Edward Hourihan, Esq.	Ingrid Palermo, Esq., Gregory McDonald, Esq. Joseph Nacca, Esq.	Attorney Work Product
EB-00026272	February 29, 2012	Electronic mail	Forwarding Paul Keneally, Esq. February 29, 2012 electronic mail, below	Wendy Eber	Janet Lissow	Attorney Client Privilege
EB-00026272 – EB-00026273	February 29, 2012	Electronic mail	Harris Beach v. Eber	Paul Keneally, Esq.	Wendy Eber, Lester Eber, Glenn Sturm, Esq. James Robertson, Esq., David Hardy, Esq. cc to William Brueckner, Esq. Rachel Bandyh, Esq.	Attorney Client Privilege
EB-00026274	February 8, 2012	Electronic Mail	Harris Beach v. Eber	Marino Fernandez, Esq.	Janet Lissow cc to Wendy Eber	Attorney Client Privilege

F  
WF  
W

F, W

*Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.*

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

**Eber Defendants' Privilege Log May 8, 2018 Production**

EB-00026275 – EB-00026279	January 31, 2012	Letter and Reply	Harris Beach v. Eber	Marino Fernandez, Esq.	Lester Eber	Attorney Client Privilege
EB-00026280	October 15, 2014	Electronic mail	Forwarding Joseph Nacca October 10, 2014 electronic mail, below	Edward Hourihan, Esq.	Cindy Raskopf	Attorney Work Product
EB-00026280 – EB-00026281	October 10, 2014	Electronic mail	Harris Beach v. Eber	Joseph Nacca, Esq.	Edward Hourihan, Esq.	Attorney Work Product
EB-00026282	October 15, 2014	Electronic mail	Forwarding Cindy Raskopf October 14, 2014 electronic mail, below	Edward Hourihan, Esq.	Cindy Raskopf	Attorney Work Product
EB-00026282	October 14, 2014	Electronic mail	Harris Beach v. Eber	Cindy Raskopf	Edward Hourihan, Esq., Ingrid Palermo, Esq., Joseph Nacca, Esq.	Attorney Work Product
EB-00026283	December 16, 2014	Electronic mail	Harris Beach v. Eber	Joseph Nacca, Esq.	Edward Hourihan, Esq. cc to Ingrid Palermo, Esq.	Attorney Work Product
EB-00026283 – EB-00026284	December 15, 2014	Electronic mail	Harris Beach v. Eber	Wendy Eber	Edward Hourihan, Esq. cc to John Herbert, Esq.	Attorney Client Privilege
EB-00026285	January 26, 2015	Electronic mail	Motion in Harris Beach v. Eber	Wendy Eber	Ingrid Palermo, Esq., John Herbert, Esq., Lester Eber, cc to Edward Hourihan, Esq.	Attorney Client Privilege

Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

**Eber Defendants' Privilege Log May 8, 2018 Production**

EB-00026286	January 23, 2015	Electronic mail	Harris Beach v. Eber	Edward Hourihan, Esq.	Mary Moore, Esq., Ingrid Palermo, Esq., Joseph Nacca, Esq.	Attorney Work Product
EB-00026286	December 15, 2014	Electronic mail	Harris Beach v. Eber	Edward Hourihan, Esq.	Ingrid Palermo, Esq., Joseph Nacca, Esq.	Attorney Work Product
EB-00026286 – EB-00026288	December 15, 2014	Electronic mail	*duplicate of Bates EB-00026283 – EB00026284	*duplicate of Bates EB-00026283 – EB00026284	*duplicate of Bates EB-00026283 – EB00026284	Attorney Client Privilege
F EB-00026289	December 15, 2014	Electronic mail	Eber Bank Agreement	John Herbert, Esq.	Edward Hourihan, Esq., cc to Wendy Eber	Attorney Client Privilege
EB-00026290	March 25, 2016	Handwritten strategy notes	Harris Beach v. Eber	Bond, Schoeneck & King PLLC	Bond, Schoeneck & King PLLC	Attorney Work Product
EB-00026291	January 5, 2016	Handwritten strategy notes	Harris Beach v. Eber	Bond, Schoeneck & King PLLC	Bond, Schoeneck & King PLLC	Attorney Work Product
EB-00026292	January 4, 2016	Handwritten strategy notes	Harris Beach v. Eber	Bond, Schoeneck & King PLLC	Bond, Schoeneck & King PLLC	Attorney Work Product
EB-00026293	Undated	Confidential Settlement Calculation	Harris Beach v. Eber	Bond, Schoeneck & King PLLC	Bond, Schoeneck & King PLLC	Attorney Work Product

Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Privilege Log 6/6/2018 Production

<u>Bates Number</u>	<u>Date of Document</u>	<u>Type of Document</u>	<u>General Subject Matter</u>	<u>Author(s)</u>	<u>Addressee(s)</u>	<u>Reason Document Withheld From Disclosure</u>
EB-00026612 – EB-00026626	5/31/2012	Electronic mail with attachment	L. Eber loan balance and EBWLC outstanding liabilities	W. Eber	E. Gumaer, Esq. L. Eber	Attorney Client Privilege
EB-00026627	12/14/2010	Electronic mail	Eber Bros. Retirement Plan	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00026627 – EB-00026628	12/13/2010	Electronic mail	Eber Bros. Retirement Plan	D. Mehalick, Esq.	W. Eber	Attorney Client Privilege
EB-00026629	2/26/2010	Electronic mail	EBWLC bank loan documents	W. Eber	L. Eber, E. Gumaer, Esq. cc to G. Sturm, Esq.	Attorney Client Privilege
EB-00026629	2/26/2010	Electronic mail	Forwarding 2/23/2010 electronic mail, below	W. Eber	W. Eber	Attorney Client Privilege
EB-00026629 – EB-00026630	2/23/2010	Electronic mail	EBWLC bank loan documents	S. Park, Esq.	W. Eber, cc to W. Gaines, Esq., P. Byrd, Esq., G. Sturm, Esq.	Attorney Client Privilege
EB-00026631	12/17/2009	Electronic mail	CNB loan	W. Eber	P. Dalton, Esq., E. Gumaer, Esq., L. Eber, Esq.	Attorney Client Privilege
EB-00026631	12/17/2009	Electronic mail	CNB loan	P. Dalton, Esq.	E. Gumaer, Esq., L. Eber, W. Eber	Attorney Client Privilege
EB-00026631	12/17/2009	Electronic mail	CNB loan	E. Gumaer, Esq.	L. Eber, P. Dalton, Esq.,	Attorney Client Privilege



Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Privilege Log 6/6/2018 Production

					W. Eber	
EB-00026631 – EB-00026632	12/17/2009	Electronic mail	CNB loan	L. Eber	P. Dalton, Esq., E. Gumaer, Esq., W. Eber	Attorney Client Privilege
EB-00026633	3/12/2012	Electronic mail	EBWLC document draft	W. Eber	E. Gumaer, Esq., cc to L. Eber	Attorney Client Privilege
EB-00026633	3/12/2012	Electronic mail	EBWLC document draft	M. Parker (Paralegal at Underberg & Kessler LLP)	W. Eber, cc to L. Eber, P. Keneally, Esq., E. Russell, Esq.	Attorney Client Privilege
EB-00026633	3/12/2012	Electronic mail	EBWLC document draft	W. Eber	M. Parker, cc to L. Eber	Attorney Client Privilege
EB-00026634	3/2/2012	Electronic mail	EBWLC document draft	M. Parker	W. Eber, cc to P. Keneally, Esq., E. Russell, Esq.	Attorney Client Privilege
EB-00026634	3/2/2012	Electronic mail	EBWLC document draft	W. Eber	M. Parker, cc to P. Keneally, Esq., E. Russell, Esq.	Attorney Client Privilege
EB-00026634 – EB-00026636	3/2/2012	Electronic mail	EBWLC document draft	M. Parker	W. Eber, cc to P. Keneally, Esq., E. Russell, Esq.	Attorney Client Privilege
EB-00026637	2/2012	Written Consent	EBWLC document draft	Underberg & Kessler LLP	W. Eber, P. Keneally, E. Russell	Attorney Client Privilege
EB-00026638	10/13/2015	Electronic mail	Legal advice regarding PBGC	W. Eber	E. Gumaer	Attorney Client Privilege
EB-00026638	10/6/2015	Electronic mail	Legal advice regarding PBGC	W. Eber	E. Gumaer	Attorney Client Privilege
EB-00026638	9/25/2015	Electronic mail	Legal advice regarding PBGC	I. Palermo, Esq.	W. Eber, J. Herbert, Esq., cc to E. Hourihan,	Attorney Client Privilege

Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Privilege Log 6/6/2018 Production

					Esq., M. Kreps, Esq.	
EB-00026638 – EB-00026639	undated	Electronic mail	Legal advice regarding PBGC	C. Johnson, Esq.	I. Palermo, Esq.	Attorney Client Privilege
EB-00026640 – EB-00026642	4/20/2018	Memorandum	Legal Advice regarding PBGC	I. Palermo, Esq. C. Johnson, Esq.	EBWLC	Attorney Client Privilege
EB-00026643	7/2/2013	Electronic mail	Legal Advice regarding PBGC	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00026643 – EB-00026644	7/2/2013	Electronic Mail	Legal Advice regarding PBGC	T. Gigot, Esq.	W. Eber, cc to G. Ford, Esq., J. Herbert, Esq.	Attorney Client Privilege
EB-00026645	12/13/2012	Electronic mail	CNB document	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00026646	12/13/2012	Electronic mail	CNB document	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00026647 – EB-00026648	11/7/2012	Letter	Alexbay case	M. Beyma, Esq.	W. Eber, G. Sturm, Esq., cc to P. Keneally, Esq.	Attorney Client Privilege
EB-00026649	7/31/2012	Electronic mail	Teamsters Union	W. Eber	V. DeBella, Esq.	Attorney Client Privilege
EB-00026650	6/7/2012	Electronic mail	EBWLC draft document	W. Eber	E. Gumaer, Esq. cc to J. Lissow	Attorney Client Privilege
EB-00026650	6/6/2012	Electronic mail	EBWLC draft document	M. McHugh (Admin. Assistant at Underberg Kessler LLP)	W. Eber, L. Eber, G. Sturm, Esq., D. Belt, Esq., cc to S. Gersz, Esq., P. Keneally, Esq., M. Beyma, Esq.	Attorney Client Privilege
EB-00026651	3/12/2012	Electronic mail	L. Eber Affidavit	W. Eber	W. Brueckner, Esq., cc to E. Gumaer, L. Eber	Attorney Client Privilege

Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Privilege Log 6/6/2018 Production

	EB-00026651	3/12/2012	Electronic mail	L. Eber Affidavit	W. Brueckner, Esq.	L. Eber, cc to W. Eber, G. Sturm, Esq., P. Keneally, Esq.	Attorney Client Privilege
W	EB-00026652	3/13/2012	Electronic mail	Alexbay case	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
	EB-00026653	5/28/2010	Electronic mail	Eber CT	W. Eber	P. Dalton, Esq., cc to J. Runke, Esq.	Attorney Client Privilege
W	EB-00026653	5/26/2010	Electronic mail	Eber Ct	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
W	EB-00026653	5/26/2010	Electronic mail	Eber CT	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
W	EB-00026653	5/26/2010	Electronic mail	Eber CT	G. Sturm, Esq.	T. Gigot, Esq., cc to W. Eber	Attorney Client Privilege
W	EB-00026654	5/26/2010	Memorandum	Eber CT	G. Sturm, Esq.	P. Dalton, Esq., cc to W. Eber, L. Eber	Attorney Client Privilege/Attorney Work Product
W	EB-00026655	3/9/2010	Electronic mail	CNB	W. Eber	E. Gumaer, Esq., cc to L. Eber	Attorney Client Privilege
NL	EB-00026655	3/9/2010	Electronic mail	CNB	E. Gumaer, Esq.	W. Eber, cc to L. Eber	Attorney Client Privilege
	EB-00026656	05/20/2014	Electronic mail	Harris Beach v. Eber	L. Eber	W. Eber	Attorney Client Privilege
	EB-00026656	5/20/2014	Electronic mail	Harris Beach v. Eber	D. Hardy, Esq.	W. Eber L. Eber	Attorney Client Privilege
	EB-00026657	10/25/2012	Electronic mail	D4 v. Eber	L. Eber	S. Carling, Esq., W. Eber, P. Keneally, Esq.	Attorney Client Privilege
	EB-00026657	10/25/2012	Electronic mail	D4 v. Eber	S. Carling, Esq.	W. Eber,	Attorney Client



					P. Keneally, Esq., cc to L. Eber	Privilege
EB-00026657 – EB-00026658	10/25/2012	Electronic mail	D4 v. Eber	W. Eber	S. Carling, Esq., P. Keneally, Esq., cc to L. Eber	Attorney Client Privilege
EB-00026659	10/1/2013	Electronic mail	Benderson v. Eber	L. Eber	W. Eber	Attorney Client Privilege
EB-00026659	10/1/2013	Electronic mail	Benderson v. Eber	W. Eber	L. Eber, P. Keneally, Esq.	Attorney Client Privilege
EB-00026659	10/1/2013	Electronic mail	Benderson v. Eber	L. Eber	W. Eber, P. Keneally, Esq.	Attorney Client Privilege
EB-00026659	10/1/2013	Electronic mail	Benderson v. Eber	W. Eber	P. Keneally, Esq., L. Eber	Attorney Client Privilege
EB-00026659	10/1/2013	Electronic mail	Benderson v. Eber	P. Keneally, Esq.	W. Eber, L. Eber	Attorney Client Privilege
EB-00026660	10/25/2012	Electronic mail	D4 v. Eber	L. Eber	S. Carling, Esq., W. Eber, cc to P. Keneally, Esq.	Attorney Client Privilege
EB-00026660	10/25/2012	Electronic mail	D4 v. Eber	S. Carling, Esq.	W. Eber, L. Eber, cc to P. Keneally, Esq.	Attorney Client Privilege
EB-00026661	6/1/2012	Electronic mail	Alexbay case	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00026661 – EB-00026662	5/24/2012	Electronic mail	Alexbay case	D. Derwoyed (Admin. Assistant at Underberg & Kessler LLP)	L. Eber, W. Eber, cc to P. Keneally, Esq.	Attorney Client Privilege
EB-00026663	5/24/2012	Electronic mail	Alexbay case	L. Eber	W. Eber	Attorney Client



Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Privilege Log 6/6/2018 Production

						Privilege
EB-00026644	1/20/2012	Electronic mail	D4 v. Eber	L. Eber	W. Eber	Attorney Client Privilege
EB-00026664	1/20/2012	Electronic mail	D4 v. Eber	W. Eber	L. Eber	Attorney Client Privilege
EB-00026664	1/20/2012	Electronic mail	D4 v. Eber	P. Keneally, Esq.	W. Eber, L. Eber, G. Sturm, Esq., cc to B. Brueckner, Esq.	Attorney Client Privilege
EB-00026665	1/30/2012	Electronic mail	D4 v. Eber	L. Eber	W. Eber	Attorney Client Privilege
EB-00026665	1/30/2012	Electronic mail	D4 v. Eber	W. Eber	P. Keneally, Esq., G. Sturm, Esq., L. Eber, cc to S. Carling, Esq.	Attorney Client Privilege
EB-00026665	1/30/2012	Electronic mail	D4 v. Eber	P. Keneally, Esq.	W. Eber, G. Sturm, Esq., L. Eber, cc to S. Carling, Esq.	Attorney Client Privilege
EB-00026666	12/29/2011	Electronic mail	Harris Beach v. Eber	L. Eber	W. Eber	Attorney Client Privilege
EB-00026666	12/29/2011	Electronic mail	Harris Beach v. Eber	W. Eber	D. Hardy, Esq., cc to L. Eber	Attorney Client Privilege
EB-00026666	12/29/2011	Electronic mail	Harris Beach v. Eber	L. Eber	G. Sturm, Esq., W. Eber	Attorney Client Privilege
EB-00026666	12/29/2011	Electronic mail	Harris Beach v. Eber	J. Lissow	L. Eber	Attorney Client Privilege
EB-00026667	12/9/2011	Electronic mail	Harris Beach v. Eber D4 v. Eber	L. Eber	P. Keneally, Esq. W. Eber, J. Roberston, Jr., Esq., D. Hardy,	Attorney Client Privilege

Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Privilege Log 6/6/2018 Production

					Esq., G. Sturm, Esq. cc to S. Carling, Esq.	
EB-00026667	12/9/2011	Electronic mail	Harris Beach v. Eber D4 v. Eber	P. Keneally, Esq.	W. Eber, J. Robertston, Jr., Esq., D. Hardy, Esq., G. Sturm, Esq. cc to S. Carling, Esq.	Attorney Client Privilege
EB-00026668	12/12/2011	Electronic mail	Harris Beach v. Eber D4 v. Eber	L. Eber	P. Keneally, Esq., W. Eber, L. Eber G. Sturm, Esq., D. Hardy, Esq.	Attorney Client Privilege
EB-00026668	12/12/2011	Electronic mail	Harris Beach v. Eber D4 v. Eber	P. Keneally, Esq.	W. Eber, L. Eber G. Sturm, Esq., D. Hardy, Esq.	Attorney Client Privilege
EB-00026668	12/12/2011	Electronic mail	Harris Beach v. Eber D4 v. Eber	W. Eber	P. Keneally, Esq., L. Eber G. Sturm, Esq., D. Hardy, Esq.	Attorney Client Privilege
EB-00026668 – EB- 00026669	12/12/2011	Electronic mail	Harris Beach v. Eber D4 v. Eber	P. Keneally, Esq.	W. Eber, L. Eber G. Sturm, Esq., D. Hardy, Esq.	Attorney Client Privilege
EB-00026669	12/12/2011	Electronic mail	Harris Beach v. Eber D4 v. Eber	W. Eber	P. Keneally, Esq., L. Eber G. Sturm, Esq.,	Attorney Client Privilege

Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

**Eber Defendants' Privilege Log 6/6/2018 Production**

					D. Hardy, Esq.	
EB-00026669	12/12/2011	Electronic mail	Harris Beach v. Eber D4 v. Eber	G. Sturm, Esq.	P. Keneally, Esq., L. Eber W. Eber, D. Hardy, Esq.	Attorney Client Privilege
EB-00026669	12/12/2011	Electronic mail	Harris Beach v. Eber D4 v. Eber	W. Eber	P. Keneally, Esq., L. Eber G. Sturm, Esq., D. Hardy, Esq.	Attorney Client Privilege
EB-00026669 – EB-00026670	12/12/2011	Electronic mail	Harris Beach v. Eber D4 v. Eber	P. Keneally, Esq.	W. Eber, L. Eber G. Sturm, Esq., D. Hardy, Esq.	Attorney Client Privilege
EB-00026670	12/12/2011	Electronic mail	Harris Beach v. Eber D4 v. Eber	L. Eber	P. Keneally, Esq.	Attorney Client Privilege
EB-00026670	12/11/2011	Electronic mail	Harris Beach v. Eber D4 v. Eber	P. Keneally, Esq.	L. Eber	Attorney Client Privilege
EB-00026670	12/11/2011	Electronic mail	Harris Beach v. Eber D4 v. Eber	L. Eber	P. Keneally, Esq.	Attorney Client Privilege
EB-00026670 – EB-00026671	12/10/2011	Electronic mail	Harris Beach v. Eber D4 v. Eber	P. Keneally, Esq.	W. Eber, L. Eber J. Robertson, Jr. Esq., G. Sturm, Esq., D. Hardy, Esq., cc to S. Carling, Esq.	Attorney Client Privilege
EB-00026671	12/9/2011	Electronic mail	Harris Beach v.	L. Eber	P. Keneally, Esq.,	Attorney Client

Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Privilege Log 6/6/2018 Production

			Eber D4 v. Eber		W. Eber, J. Robertson, Jr. Esq., G. Sturm, Esq., D. Hardy, Esq.	Privilege
CF EB-00026671 – EB-00026674	12/9/2011	Electronic mail	Harris Beach v. Eber D4 v. Eber	P. Keneally, Esq.	W. Eber, L. Eber J. Robertson, Jr. Esq., G. Sturm, Esq., D. Hardy, Esq., cc to S. Carling, Esq.	Attorney Client Privilege
CF EB-00026675	11/30/2011	Electronic mail	D4 v. Eber	L. Eber	S. Carling, Esq., P. Keneally, Esq., W. Eber, cc to G. Sturm, Esq., D. Hardy, Esq.	Attorney Client Privilege
CF EB-00026675	11/30/2011	Electronic mail	D4 v. Eber	S. Carling, Esq.	P. Keneally, Esq., W. Eber, L. Eber, cc to G. Sturm, Esq., D. Hardy, Esq.	Attorney Client Privilege
F EB-00026676	4/2/2010	Electronic mail	Eber Bros. Confidentiality Agreement	L. Eber	S. Park, Esq., W. Eber, cc to G. Sturm, Esq., P. Byrd, Esq.	Attorney Client Privilege
F EB-00026676	4/2/2010	Electronic mail	Eber Bros. Confidentiality Agreement	S. Park, Esq.	W. Eber, cc to G. Sturm, Esq., L. Eber,	Attorney Client Privilege



Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Privilege Log 6/6/2018 Production

					P. Byrd, Esq.	
EB-00026676 – EB-00026677	4/2/2010	Electronic mail	Eber Bros. Confidentiality Agreement	W. Eber	S. Park, Esq., cc to G. Sturm, Esq., L. Eber	Attorney Client Privilege
EB-00026678	5/20/2009	Electronic mail	CNB	L. Eber	W. Eber	Attorney Client Privilege
EB-00026678	5/20/2009	Electronic mail	CNB	P. Dalton	L. Eber, W. Eber	Attorney Client Privilege
EB-00026679	3/28/2010	Electronic mail	Loan with CNB	W. Eber	E. Gumaer, Esq. cc to L. Eber	Attorney Client Privilege
EB-00026679	3/21/2010	Electronic mail	Attorney retention decision	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
EB-00026679	3/21/2010	Electronic mail	Draft letter to S. Kleeberg	W. Eber	L. Eber, cc to E. Gumaer, Esq.	Attorney Client Privilege
EB-00026679 – EB-00026680	3/20/2010	Electronic mail	Draft letter to S. Kleeberg	G. Sturm, Esq.	W. Eber	Attorney Client Privilege
EB-00026681	10/22/2010	Electronic mail	Draft letter to S. Kleeberg	E. Gumaer, Esq.	L. Eber	Attorney Client Privilege
EB-00026682	9/16/2011	Electronic mail	Trust meeting	L. Eber	W. Eber, G. Sturm, Esq.	Attorney Client Privilege
EB-00026682	9/16/2011	Electronic mail	Trust meeting	W. Eber	L. Eber, G. Sturm, Esq.	Attorney Client Privilege
EB-00026683	12/17/2009	Electronic mail	CNB	L. Eber	W. Eber	Attorney Client Privilege
EB-00026683	12/17/2009	Electronic mail	CNB	P. Dalton, Esq.	E. Gumaer, Esq., L. Eber, W. Eber	Attorney Client Privilege
EB-00026683	12/17/2009	Electronic mail	CNB	E. Gumaer, Esq.	L. Eber, P. Dalton, Esq. W. Eber	Attorney Client Privilege
EB-00026683	12/17/2009	Electronic mail	CNB	L. Eber	E. Gumaer, Esq.,	Attorney Client

*Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.*

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

**Eber Defendants' Privilege Log 6/6/2018 Production**

					P. Dalton, Esq., W. Eber	Privilege
EB-00026684	6/15/2015	Electronic mail	PBGC litigation	L. Eber	W. Eber	Attorney Client Privilege
EB-00026684	6/12/2015	Electronic mail	PBGC litigation	W. Eber	L. Hassel, Esq., E. Fry, E. Hourihan, Esq. cc to I. Palermo, Esq., L. Eber, J. Herbert, Esq., G. Ford, Esq.	Attorney Client Privilege
EB-00026684	6/12/2015	Electronic mail	PBGC litigation	L. Hassel, Esq.	E. Fry, E. Hourihan, Esq. cc to I. Palermo, Esq., L. Eber, J. Herbert, Esq., G. Ford, Esq., W. Eber	Attorney Client Privilege
EB-00026684 EB- 00026685	6/12/2015	Electronic mail	PBGC litigation	E. Fry	E. Hourihan, cc to L. Hassel, Esq., W. Eber, I. Palermo, L. Eber, J. Herbert, Esq., G. Ford	Attorney Client Privilege
EB-00026685	6/12/2015	Electronic mail	PBGC litigation	E. Hourihan	L. Hassel, Esq., E. Fry, W. Eber, I. Palermo, Esq., L. Eber, J. Herbert, Esq., G. Ford, Esq.	Attorney Client Privilege
EB-00026685 – EB- 00026686	6/12/2015	Electronic mail	PBGC litigation	L. Hassel, Esq.	E. Fry, E. Hourihan, Esq. cc to I. Palermo, Esq., L.	Attorney Client Privilege

Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

**Eber Defendants' Privilege Log 6/6/2018 Production**

					Eber, J. Herbert, Esq., G. Ford, Esq., W. Eber	
EB-00026686	6/12/2015	Electronic mail	PBGC litigation	E. Hourihan	W. Eber, G. Ford, Esq. cc to L. Hassel, Esq., E. Fry, I. Palermo, Esq., L. Eber, J. Herbert, Esq.	Attorney Client Privilege
EB-00026686 – EB-00026687	6/11/2015	Electronic mail	PBGC litigation	G. Ford, Esq.	W. Eber, cc to E. Hourihan, Esq., L. Hassel, Esq., E. Fry, I. Palermo, Esq., L. Eber, J. Herbert, Esq.	Attorney Client Privilege
EB-00026687	6/11/2015	Electronic mail	PBGC litigation	W. Eber	L. Hassel, Esq., E. Fry, E. Hourihan, Esq., I. Palermo, Esq., L. Eber, J. Herbert, Esq., G. Ford, Esq.	Attorney Client Privilege
EB-00026687	6/11/2015	Electronic mail	PBGC litigation	E. Hourihan	I. Palermo, Esq., L. Hassel, Esq. cc to W. Eber, G. Ford, Esq., E. Fry, L. Eber, J. Herbert, Esq.	Attorney Client Privilege
EB-00026687 EB-00026688	6/11/2015	Electronic mail	PBGC litigation	L. Hassel, Esq.	E. Hourihan, Esq., I. Palermo, Esq., cc to E. Fry, L. Eber,	Attorney Client Privilege

Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Privilege Log 6/6/2018 Production

					J. Herbert, Esq., G. Ford, Esq., W. Eber	
EB-00026688	6/11/2015	Electronic mail	PBGC litigation	I. Palermo, Esq.	E. Hourihan, Esq., L. Hassel, Esq., cc to E. Fry, L. Eber, J. Herbert, Esq., G. Ford, Esq., W. Eber	Attorney Client Privilege
EB-00026688 – EB-00026689	6/11/2015	Electronic mail	PBGC litigation	L. Hassel, Esq.	E. Hourihan, Esq., cc to I. Palermo, Esq., E. Fry, L. Eber, J. Herbert, Esq., G. Ford, Esq., W. Eber	Attorney Client Privilege
EB-00026689	6/11/2015	Electronic mail	PBGC litigation	E. Hourihan	I. Palermo, Esq., L. Hassel, Esq., W. Eber, G. Ford, Esq., E. Fry, L. Eber, J. Herbert, Esq.	Attorney Client Privilege
EB-00026690	12/30/2011	Electronic mail	Harris Beach v. Eber	L. Eber	M. Fernandez, Esq., cc to W. Eber	Attorney Client Privilege
EB-00026691	1/28/2008	Electronic mail	CNB	L. Eber	W. Eber	Attorney Client Privilege
EB-00026691	1/28/2008	Electronic mail	CNB	D. Dean	L. Eber, W. Eber, cc to P. Dalton, Esq.	Attorney Client Privilege
EB-00026692	11/9/2007	Electronic mail	HSBC	L. Eber	W. Eber, P.	Attorney Client

F  
NL  
NL



Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

**Eber Defendants' Privilege Log 6/6/2018 Production**

					Dalton, Esq.	Privilege
EB-00026693	12/5/2011	Electronic mail	CNB	W. Eber	L. Eber	Attorney Client Privilege
EB-00026693	12/5/2011	Electronic mail	CNB	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
EB-00026693	12/5/2011	Electronic mail	CNB	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00026694	12/8/2011	Electronic mail	CNB	W. Eber	E. Gumaer, Esq. , cc to L. Eber	Attorney Client Privilege
EB-00026695	12/4/2011	Electronic mail	CNB	G. Sturm, Esq.	L. Eber, cc to W. Eber	Attorney Client Privilege
EB-00026695	12/2/2011	Electronic mail	CNB	L. Eber	G. Sturm, Esq.	Attorney Client Privilege
EB-00026696	9/16/2011	Electronic mail	Trustee Meeting	L. Eber	W. Eber, G. Sturm, Esq.	Attorney Client Privilege
EB-00026696	9/16/2011	Electronic mail	Trustee Meeting	W. Eber	G. Sturm, Esq., cc to L. Eber	Attorney Client Privilege

Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Privilege Log 7/12/2018 Production

<u>Bates Number</u>	<u>Date of Document</u>	<u>Type of Document</u>	<u>General Subject Matter</u>	<u>Author(s)</u>	<u>Addressee(s)</u>	<u>Reason Document Withheld From Disclosure</u>
EB-00031198	7/28/2015	Electronic mail	Legal advice regarding Eber-CT	W. Eber	L. Eber	Attorney Client Privilege
EB-00031198	7/27/2015	Electronic mail	Legal advice regarding Eber-CT	W. Eber	L. Eber	Attorney Client Privilege
EB-00031199	3/9/2012	Electronic mail	Legal advice regarding Eber-CT	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031200	3/8/2012	Electronic mail	Legal advice regarding Eber-CT	W. Eber	E. Gumaer, Esq., cc to L. Eber	Attorney Client Privilege
EB-00031201	3/2/2012	Electronic mail	Legal advice regarding Eber-CT	L. Eber	E. Gumaer, Esq., cc to W. Eber	Attorney Client Privilege
EB-00031202	1/10/2013	Electronic mail	Legal advice regarding Eber Bros.	L. Eber	W. Eber, E. Gumaer, Esq.	Attorney Client Privilege
EB-00031202	1/10/2013	Electronic mail	Legal advice regarding Eber Bros.	W. Eber	L. Eber, E. Gumaer, Esq.	Attorney Client Privilege
EB-00031203	11/9/2013	Electronic mail	Legal advice regarding Eber Bros.	E. Gumaer, Esq.	W. Eber, L. Eber	Attorney Client Privilege
EB-00031204	1/4/2010	Electronic mail	Legal advice regarding financials	W. Eber	P. Dalton, Esq., cc L. Eber	Attorney Client Privilege
EB-00031205	10/22/2010	Electronic mail	Legal advice regarding draft letter	E. Gumaer, Esq.	L. Eber	Attorney Client Privilege
EB-00031206	10/27/2010	Electronic mail	Legal advice regarding draft letter	E. Gumaer, Esq.	J. Lissow, cc. L. Eber	Attorney Client Privilege

Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Privilege Log 7/12/2018 Production

EB-00031207	11/18/2010	Electronic mail	Legal advice regarding draft letter	E. Gumaer, Esq.	L. Eber	Attorney Client Privilege
EB-00031208	12/10/2010	Electronic mail	Legal advice regarding draft letter	E. Gumaer, Esq.	L. Eber	Attorney Client Privilege
EB-00031208	12/10/2010	Electronic mail	Legal advice regarding draft letter	L. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031209	1/31/2010	Electronic mail	Legal advice regarding financials	L. Eber	E. Gumaer, Esq., cc W. Eber	Attorney Client Privilege
EB-00031210	11/22/2013	Electronic mail	Legal advice regarding EBWLC stock	E. Gumaer, Esq.	L. Eber, cc. to W. Eber	Attorney Client Privilege
EB-00031210	11/22/2013	Electronic mail	Legal advice regarding EBWLC stock	L. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031210	11/22/2013	Electronic mail	Legal advice regarding EBWLC stock	W. Eber	E. Gumaer, Esq., cc. to L. Eber	Attorney Client Privilege
EB-00031210	11/21/2013	Electronic mail	Legal advice regarding EBWLC stock	E. Gumaer, Esq.	W. Eber, cc to L. Eber	Attorney Client Privilege
EB-00031211	11/18/2013	Electronic mail	Legal advice regarding CNB	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031211	11/18/2013	Electronic mail	Legal advice regarding CNB	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
EB-00031211	11/18/2013	Electronic mail	Legal advice regarding CNB	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031211	11/8/2013	Electronic mail	Legal advice regarding CNB	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege



Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Privilege Log 7/12/2018 Production

EB-00031212	6/7/2017	Electronic mail	Legal advice regarding Surrogate's Court matter	W. Eber	J. Vazzana, Esq.	Attorney Client Privilege
EB-00031213	11/19/2012	Electronic mail	Legal advice regarding bank Amortization Schedule	W. Eber	E. Gumaer, Esq., cc L. Eber	Attorney Client Privilege
EB-00031214	3/12/2012	Electronic mail	Legal advice regarding bank loan	W. Eber	M. Fernandez, Esq., E. Gumaer, Esq.	Attorney Client Privilege
EB-00031215	12/15/2010	Electronic mail	Legal advice regarding amendment	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031216 – EB-00031217	12/14/2010	Electronic mail	Legal advice regarding EBWLC board document	W. Eber	L. Eber, E. Gumaer, Esq.	Attorney Client Privilege
EB-00031218	9/17/2010	Electronic mail	Legal advice regarding L. Eber letters	W. Eber	E. Gumaer, Esq., cc G. Sturm, Esq.	Attorney Client Privilege
EB-00031219	9/17/2010	Electronic mail	Legal advice regarding L. Eber letters	W. Eber	E. Gumaer, Esq., cc G. Sturm, Esq.	Attorney Client Privilege
EB-00031220 – EB-00031224	7/29/2010	Electronic mail	Legal advice regarding Eber Bros. document draft	W. Eber	E. Gumaer, Esq., cc to L. Eber	Attorney Client Privilege
EB-00031225	3/24/2010	Electronic mail	Legal advice regarding draft letters	W. Eber	E. Gumaer, cc L. Eber	Attorney Client Privilege
EB-00031225	3/24/2010	Electronic mail	Legal advice regarding draft letters	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege



Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Privilege Log 7/12/2018 Production

EB-00031225	3/24/2010	Electronic mail	Legal advice regarding draft letters	E. Gumaer, Esq.	L. Eber	Attorney Client Privilege
EB-00031226 – EB-00031227	3/4/2010	Electronic mail	Legal advice regarding Eber Bros. draft documents	W. Eber	L. Eber, E. Gumaer, Esq., cc G. Sturm, Esq.	Attorney Client Privilege
EB-00031228	2/10/2010	Electronic mail	Legal advice regarding First Republic	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031228	2/10/2010	Electronic mail	Legal advice regarding First Republic	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
EB-00031228	2/10/2010	Electronic mail	Legal advice regarding First Republic	W. Eber	E. Gumaer, Esq., cc L. Eber	Attorney Client Privilege
EB-00031228 – EB-00031229	2/8/2010	Electronic mail	Legal advice regarding First Republic	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
EB-00031230	12/2/2009	Electronic mail	Legal advice regarding L. Eber letter	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031230 – EB-00031231	12/1/2009	Electronic mail	Legal advice regarding L. Eber letter	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
EB-00031232 – EB-00031238	11/27/2009	Electronic mail	Legal advice regarding Eber Bros. draft document	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031239	4/1/2010	Electronic mail	Directors & Officers Insurance legal advice	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege

Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Privilege Log 7/12/2018 Production

EB-00031239	3/31/2010	Electronic mail	Directors & Officers Insurance legal advice	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031239	3/31/2010	Electronic mail	Directors & Officers Insurance legal advice	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
EB-00031239 – EB-00031240	3/30/2010	Electronic mail	Directors & Officers Insurance legal advice	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031241	12/5/2011	Electronic mail	Legal advice regarding CNB proposal	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
EB-00031241	12/5/2011	Electronic mail	Legal advice regarding CNB proposal	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031242	8/20/2014	Electronic mail	Legal advice regarding Eber estates	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
EB-00031242	8/18/2014	Electronic mail	Legal advice regarding Eber estates	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031243	8/15/2013	Electronic mail	Legal advice regarding CNB, pension and finances	E. Gumaer, Esq.	W. Eber, L. Eber	Attorney Client Privilege
EB-00031244	7/29/2013	Electronic mail	Legal advice regarding CNB	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
EB-00031245	6/27/2013	Electronic mail	Legal advice regarding CNB	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
EB-00031245	6/27/2013	Electronic mail	Legal advice regarding CNB	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031246	12/13/2012	Electronic mail	Legal advice regarding CNB	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege



Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Privilege Log 7/12/2018 Production

EB-00031247	2/17/2012	Electronic mail	Legal advice regarding Pension Plan	W. Eber	E. Gumaer, Esq., cc L. Eber	Attorney Client Privilege
EB-00031247	2/17/2012	Electronic mail	Legal advice regarding Pension Plan	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
EB-00031247	2/15/2012	Electronic mail	Legal advice regarding Pension Plan	W. Eber	E. Gumaer, Esq., cc L. Eber	Attorney Client Privilege
EB-00031248	2/14/2012	Electronic mail	Legal advice regarding Pension Plan	S. Kornreich, Esq.	W. Eber	Attorney Client Privilege
EB-00031249 CF	12/19/2011	Electronic mail	Legal advice regarding tax	W. Eber	E. Gumaer, Esq., cc L. Eber	Attorney Client Privilege
EB-00031250 CF	12/12/2011	Electronic mail	Legal advice regarding CNB	W. Eber	G. Sturm, Esq., E. Gumaer, Esq., cc L. Eber	Attorney Client Privilege
EB-00031251 CF	12/8/2011	Electronic mail	Legal advice regarding CNB	W. Eber	E. Gumaer, Esq., cc L. Eber	Attorney Client Privilege
EB-00031252	10/13/2011	Electronic mail	Legal advice regarding CNB	W. Eber	E. Gumaer, Esq., cc L. Eber	Attorney Client Privilege
EB-00031253 – EB-00031259	2/29/2016	Electronic mail	Legal advice regarding Eber-CT draft documents	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031260 – EB-00031263	10/13/2015	Electronic mail	Legal advice regarding EBWLC draft documents	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031264	10/8/2015	Electronic mail	Legal advice regarding EBWLC draft documents	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031265 – EB-00031268	4/1/2014	Electronic mail	Legal advice regarding EBWLC draft documents	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege

Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Privilege Log 7/12/2018 Production

EB-00031269	12/10/2013	Electronic mail	Legal advice regarding letter	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031269	11/18/2013	Electronic mail	Legal advice regarding CNB	W. Eber	E. Gumaer, Esq., cc L. Eber	Attorney Client Privilege
EB-000312710	11/22/2013	Electronic mail	Legal advice regarding EBWLC stock	W. Eber	E. Gumaer, Esq., cc L. Eber	Attorney Client Privilege
EB-00031270	11/21/2013	Electronic mail	Legal advice regarding EBWLC stock	E. Gumaer, Esq.	W. Eber, cc L. Eber	Attorney Client Privilege
EB-00031270	11/18/2013	Electronic mail	Legal advice regarding CNB statement	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031270	11/18/2013	Electronic mail	Legal advice regarding CNB	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
EB-00031271	11/18/2013	Electronic mail	Legal advice regarding CNB	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031271 – EB-00031272	11/8/2013	Electronic mail	Legal advice regarding CNB	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031273	6/27/2013	Electronic mail	Legal advice regarding Webster Bank draft document	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031274	5/16/2013	Electronic mail	Legal advice regarding legal fees	W. Eber	G. Sturm, Esq.	Attorney Client Privilege
EB-00031274	5/7/2013	Electronic mail	Legal advice regarding legal fees	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
EB-00031275	2/15/2013	Electronic mail	Legal advice regarding CNB loan/resolutions	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege



Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

## Eber Defendants' Privilege Log 7/12/2018 Production

EB-00031275	2/14/2013	Electronic mail	Legal advice regarding CNB loan/resolutions	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
EB-00031275	2/14/2013	Electronic mail	Legal advice regarding CNB loan/resolutions	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031275	2/14/2013	Electronic mail	Legal advice regarding CNB loan/resolutions	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
EB-00031275 – EB-00031276	2/12/2013	Electronic mail	Legal advice regarding CNB loan/resolutions	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031276 – EB-00031277	1/28/2013	Electronic mail	Legal advice regarding CNB loan/resolutions	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031278	12/21/2012	Electronic mail	Legal advice regarding CNB loan	W. Eber	E. Gumaer, Esq., cc L. Eber	Attorney Client Privilege
EB-00031279	12/13/2012	Electronic mail	Legal advice regarding security agreement	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031280	11/21/2012	Electronic mail	Legal advice regarding legal fees	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031281	11/19/2012	Electronic mail	Legal advice regarding CNB loan documents	W. Eber	E. Gumaer, Esq., cc L. Eber	Attorney Client Privilege
EB-00031282	3/14/2012	Electronic mail	Legal advice regarding CNB loan	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031283	1/31/2013	Electronic mail	Legal advice regarding CNB loan	W. Eber	M. Beyma, Esq.	Attorney Client Privilege

*Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.*

United States District Court for the Southern District

Civ. Action No.: 16-cv-9517(LAK)

**Eber Defendants' Privilege Log 7/12/2018 Production**

EB-00031283	1/31/2013	Electronic mail	Legal advice regarding CNB loan	E. Gumaer, Esq.	W. Eber	Attorney Client Privilege
EB-00031283	1/28/2013	Electronic mail	Legal advice regarding CNB loan	W. Eber	E. Gumaer, Esq.	Attorney Client Privilege
EB-00031284	4/10/2012	Electronic mail	Legal advice regarding Eber Bros. Board Meeting Minutes	W. Eber	M. Fernandez, Esq., E. Gumaer, Esq., L. Eber	Attorney Client Privilege